

From: Roger Reynolds [mailto:rreynolds@summerseng.com]
Sent: Wednesday, April 06, 2011 4:36 PM
To: Davidoff, Baryohay
Cc: Mike Wade
Subject: RE: ASC REMINDER: Comments due by 5 PM tomorrow
Importance: High

Baryohay:

I do appreciate all of your and the others work in attempting to develop the regulations for the Draft Water Measurement Regulation. As I first expressed in my January 4, 2011 email to you the Certification and Performance Requirements for measuring devices will create a cumbersome, time consuming, and in many ways unneeded additional work load for many water suppliers. The emphasis in the Water Code Section 10608.48 (b) 1 is to "Measure the volume of water delivered to customers with sufficient accuracy to comply with the subdivision of Section 531.10" (Emphasis mine). Some of the proposed Certification and Performance Requirements go well beyond the "sufficient accuracy" requirement and changes are needed.

I have only briefly skimmed through the Fiscal Analysis report, but it appears the potential economic impact may be underestimated. The estimated number of turnouts listed in Table 3 that currently meet the proposed regulations appears to be too high for the southern S.J. Valley. The southern S.J. Valley total represents almost half of the total turnouts listed in Table 1. If this number is off significantly it would have a major impact on the total fiscal impact of meeting the proposed regulation as written. I had indicated to Steve Hatchet that the estimates were in some ways just a guess until a survey was completed. Contacts with a few water suppliers indicate there are a greater number of turnouts that will need to be replaced or repaired to meet the proposed regulations. I think the fiscal analysis should error on the conservative side so the maximum potential costs are clearly identified.

While not a water supplier, Summers Engineering is a consultant to numerous water suppliers in California. I strongly support the letter being submitted by a coalition of ag water suppliers addressing the following concerns and proposing specific changes to improve the proposed regulations:

1. Implementation deadline is impractical.
2. Accuracy standards are too high and difficult to interpret.
3. Certification and Performance Requirements are onerous.

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